

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

FILED
MAY 27 2003
Michael N. Milby, Clerk
U.S. District Court
Southern District of Texas

IN RE ENRON CORPORATION §
SECURITIES AND DERIVATIVE & § MDL 1446
"ERISA" LITIGATION §

MARK NEWBY, et al., §
§
Plaintiffs, §
§
v. § C.A. NO. H-01-3624
§ AND CONSOLIDATED CASES
ENRON CORPORATION, et al., §
§
Defendants. §

PAMELA M. TITTLE, on behalf of §
herself and a class of persons similarly §
situated, et al., §
§
Plaintiffs, §
§
v. § C.A. NO. H-01-3913
§
ENRON CORP., an Oregon corporation, §
et al., §
§
Defendants. §

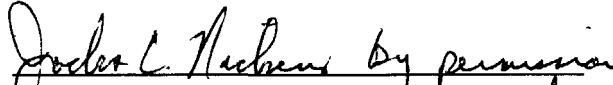
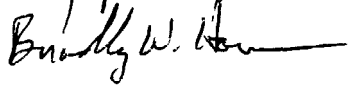
**STEVEN J. KEAN'S JOINDER IN THE OUTSIDE
DIRECTOR DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

Defendant Steven J. Kean respectfully joins in the motion and the arguments presented in the Outside Director Defendants' Motion for Protective Order ("the Motion") in order to shield from discovery certain categories of private information. Mr. Kean was served with the identical document requests on May 17, 2002. Mr. Kean has documents that fall into one or more of the

1430

categories set out in the Motion. Mr. Kean requests that the Court grant to him the relief requested in the Motion with respect to the documents that he will produce.

Respectfully submitted,


Jack C. Nickens
State Bar No. 15013800 
600 Travis, Suite 7500
Houston, Texas 77002
(713) 571-9191
(713) 571-9652 (Fax)

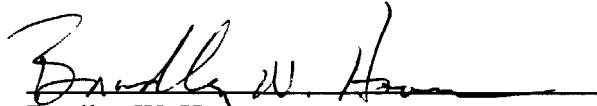
ATTORNEY-IN-CHARGE FOR
DEFENDANT STEVEN J. KEAN

OF COUNSEL:

Paul D. Flack
NICKENS, KEETON, LAWLESS,
FARRELL & FLACK, L.L.P.
600 Travis, Suite 7500
Houston, Texas 77002
(713) 571-9191
(713) 571-9652 (Fax)

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the pleading was served on all counsel of record on the Service List on May 27, 2003 via posting to www.es13624.com in compliance with the Court's Order Regarding Service of Papers and Notice of Hearings Via Independent Website.


Bradley W. Hoover